

Fill in this information to identify the case:

Debtor 1 Donell Talley

Debtor 2 Tammy Irene Talley  
(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of Pennsylvania  
(State)

Case number 1:19-bk-00221-HWV

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: The Bank of New York Mellon Trust Company N.A. fka The Bank of New York Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee for GMACM Home Equity Loan Trust 2006-HE3 Court claim no. (if known): 19

Last 4 digits of any number you use to identify the debtor's account: 8 1 0 0

Property address: 5488 Kenwood Ave  
Number Street

Harrisburg, Pennsylvania 17112  
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 01 / 01 / 2025  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

     /      /       
MM / DD / YYYY

Debtor 1 Donell Talley  
First Name Middle Name Last Name

Case number (if known) 1:19-bk-00221-HWV

**Part 4:** Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5:** Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Elizabeth K. Holdren  
Signature

Date 01 / 27 / 2025

Print Elizabeth K. Holdren  
First Name Middle Name Last Name

Title Authorized Agent

Company Hill Wallack LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 21 Roszel Road, P.O. Box 5226  
Number Street

Princeton, NJ 08543-5226  
City State ZIP Code

Contact phone ( 609 ) 734 - 6345

Email eholdren@hillwallack.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
(HARRISBURG)**

IN RE:

Donell Talley and Tammy Irene Talley

Debtor(s).

CHAPTER 13

CASE NO.: 1:19-bk-00221-HWV

**CERTIFICATE OF SERVICE**

I hereby certify that service was made upon all interested parties, indicated below of Response to Notice of Final Cure of NewRez LLC d/b/a Shellpoint Mortgage Servicing as servicer for The Bank of New York Mellon Trust Company N.A. fka The Bank of New York Mellon Trust Company, N.A., as successor to JPMorgan Chase Bank, N.A., as Trustee for GMACM Home Equity Loan Trust 2006-HE3 on January 27, 2025:

Donell Talley  
5488 Kenwood Avenue  
Harrisburg, PA 17112

**Debtor**

**Via Regular Mail**

Tammy Irene Talley  
5488 Kenwood Avenue  
Harrisburg, PA 17112

**Debtor**

**Via Regular Mail**

Kara Katherine Gendron  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101

**Counsel for Debtor**

**Via ECF**

United States Trustee  
US Courthouse  
1501 N 6<sup>th</sup> St.  
Harrisburg, PA 17102  
**United States Trustee**  
**Via ECF**

Jack N Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
**Via ECF**

By: /s/ Leslie M. DeJesus